



27 September 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA. 02140

Re: National Environmental Achievement Track Application

Dear Sir:

Please enclosed find the submittal package for consideration of the Rohm and Haas Hayward Plant in EPA's National Environmental Performance Track program. The attachments in this submittal include the National Environmental Achievement Track application and Environmental Requirements Checklist.

Please feel free to call me at (510) 784-5705 if any additional information would be helpful. Thank you for your consideration.

Very truly yours,

ROHM AND HAAS COMPANY

Kathleen A. Haddock
Environmental Manager
Hayward Plant

enclosures



***National
Environmental
Achievement Track***

Application Form

Rohm and Haas - Hayward Plant

Name of facility

Rohm and Haas Company

Name of parent company (if any)

25500 Whitesell Street

Street address

Street address (continued)

Hayward, CA. 94545

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Kathleen A. Haddock

Title Environmental Manager

Phone 510-784-5705

Fax 510-782-8267

E-mail Kathy_A_Haddock@rohmmaas.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

Acrylic and vinyl acrylic emulsion polymers

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2821

NAICS
325211

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☒ 50-99

☐ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

RCRIS/EPA Facility ID: CAD020028072
TRIS: 94545RHMND25500
AIRS/AFS: CA0877577
RMP: 100000119187

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

Checklist is attached

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

The Rohm and Haas Hayward plant has maintained a leadership role in the Southern Alameda County CAER group. Additionally, as a participating member in the American Chemical Council, the facility conducts annual self-audits of the Codes of Management Practices.

We continue to foster good relationships with our local governing agencies, and have been called upon by those agencies to assist other companies with environmental issues.

Rohm and Haas Hayward plant has demonstrated substantial community support and involvement with such organizations as the Hayward Chamber of Commerce, St. Rose Hospital, Hayward Education Foundation, Tennyson High School, and CAER.

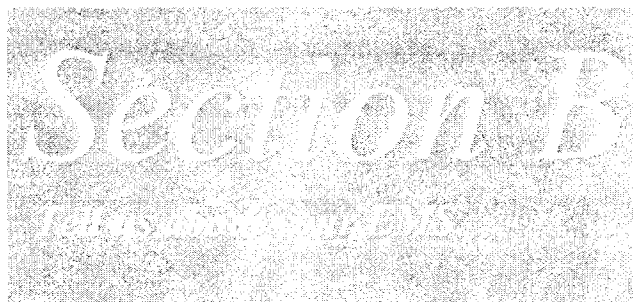
Past recognitions have included environmental achievement awards from the City of Hayward and the California Water Pollution Control Association.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|--|---|
| <i>a.</i> Environmental policy | <input checked="" type="checkbox"/> Yes |
| <i>b.</i> Planning | <input checked="" type="checkbox"/> Yes |
| <i>c.</i> Implementation and operation | <input checked="" type="checkbox"/> Yes |
| <i>d.</i> Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| <i>e.</i> Management review | <input checked="" type="checkbox"/> Yes |

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other Corporate Audit

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Reduction in total solid waste	1650	tons	1565	tons
<p>i. How is the current level an improvement over the previous level?</p> <p>Over the past ten years, the Rohm and Haas Hayward plant has undertaken numerous projects to improve product yield and decrease process waste. These efforts have resulted in a 69% reduction in solid waste, despite a 27% increase in production. During the 1997 - 1999 time frame, total solid waste was reduced by 5%. Although this quantity is small compared with earlier years, it represents the facility's constant improvement efforts in waste reduction.</p> <p>ii. How did you achieve this improvement?</p> <p>The Rohm and Haas Hayward plant has a cross-functional team whose goal is to identify projects for increasing product yield. The team's activities have been instrumental in reducing the amount of product lost to the waste water system, resulting in the reduction of sand filter cake, our largest waste stream.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Accidental Release History	49	tons	14	tons
<p>i. How is the current level an improvement over the previous level?</p> <p>The facility lowered the frequency and quantity of emulsion spills, reducing product losses due to spills by 70%. Side benefits include reduced treatment chemicals and energy requirements, as well as material handling improvements which may reduce the risk of more environmentally serious incidents.</p> <p>ii. How did you achieve this improvement?</p> <p>Rohm and Haas Hayward plant initiated an "Incident Investigation: Case Studies" training module for all newly hired production operators. This training, as well as extensive communication of primary and contributing causes of incidents, has led to a reduction in the number and severity of accidental spills.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Total Electrical Energy Use
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output 130 BTU/lb. product (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:
Absolute value
(Quantity/Units)
- ☒ Option B:
In terms of units of production or output
124 BTU/ lb. product
(Quantity/Units)

e. How will you achieve this improvement?

To reduce electrical energy consumption, the facility will:

- upgrade to more energy efficient lighting
- institute a non-essential energy shutdown procedure
- investigate energy savings form tighter management of refrigeration units
- conduct a utility company energy audit to identify further energy savings.

Second aspect you've selected

a. What is the aspect?

Hazardous Solid Waste

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value
35,000 lbs./year
(Quantity/Units)
- ☐ Option B:
In terms of units of production or output
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:
Absolute value
(Quantity/Units)
- ☒ Option B:
In terms of units of production or output
25,000 lbs./year
(Quantity/Units)

e. How will you achieve this improvement?

The facility will reduce hazardous waste generation by 30% through:

- tighter management of hazardous raw materials inventory when discontinuing product lines
- enhanced incident investigation of hazardous materials spills to identify root causes and institute systematic corrective action.

Third aspect you've selected

- a. What is the aspect? Total Solid Waste
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:
Absolute value (Quantity/Units)
- ☒ Option B:
In terms of units of production or output 14.6 lbs./1000 lbs. product (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:
Absolute value (Quantity/Units)
- ☒ Option B:
In terms of units of production or output 13.1 lbs./1000 lbs. product (Quantity/Units)
- e. How will you achieve this improvement? To achieve this 10% reduction in solid waste, the facility will:
- continue current whitewater reduction activities
 - investigate process improvements to reduce gel waste.

Fourth aspect you've selected

- a. What is the aspect? Accidental Release History
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value 17 incidents/year (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value 12 incidents/year (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? To achieve a 30% reduction in the number of accidental releases, the Hayward plant will:
- continue current operator training
 - implement a more indepth incident investigation methodology using root cause analysis.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

The Rohm and Haas Hayward plant has surveyed community concerns at a Community Risk Seminar, at Open House activities, using the Conditional Use Permit process, and during face-to-face meetings with surrounding neighbors. We have responded to community concerns by hosting plant tours including overviews of operations, conducting off-site exposure monitoring, and through direct letters and telephone conversations with individuals.

2 How do you inform community members of important matters that affect them?

The Rohm and Haas Hayward plant has a community outreach program to educate responders, government officials, the media, other businesses, community members. Outreach activities include participation in CAER, hosting plant tours and on-site training for local emergency response personnel, participation in community fairs, and public RMP meetings and informational brochures.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website www.

☐ Newspaper

☒ Open Houses

☒ Other

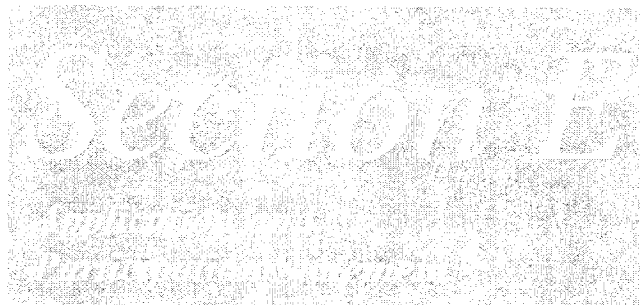
The Achievement Track Annual Performance Report will be distributed at various community outreach events in which our local CAER group participates.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Hayward Chamber of Commerce	John Hunter, Sr.	510-785-6500
<i>State/Local Regulator</i>	Hayward Fire Department Hazardous Materials Division	Hugh Murphy	510-583-4924
<i>Other community/local reference</i>	LEPC/CAER officer	Jim Nelson	510-790-8613



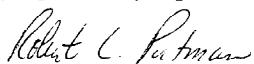
On behalf of Rohm and Haas - Hayward Plant
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date  9/27/00

Printed Name/Title Robert L. Putman, Plant Manager

Facility Name Rohm and Haas - Hayward Plant

Facility Street Address 25500 Whitesell Street
Hayward, CA. 94545

Facility ID Numbers	RCRIS/EPA Facility ID:	CAD020028072
	TRIS:	94545RHMND25500
	AIRS/AFS:	CA0877577
	RMP:	100000119187

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Rohm and Haas - Hayward Plant
Facility Location: 25500 Whitesell Street, Hayward, CA. 94545
Facility ID Number(s): RCRIS/EPA Facility ID: CAD020028072
(attach additional sheets if necessary) TRIS: 94545RHMND25500
AIRS/AFS: CA0877577 RMP: 100000119187

Air Pollution Regulations

Check All
That Apply

- | | |
|---|-------------------------------------|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | <input checked="" type="checkbox"/> |
| 2. Permits and Registration of Air Pollution Sources | <input checked="" type="checkbox"/> |
| 3. General Emission Standards, Prohibitions and Restrictions | <input checked="" type="checkbox"/> |
| 4. Control of Incinerators | <input type="checkbox"/> |
| 5. Process Industry Emission Standards | <input type="checkbox"/> |
| 6. Control of Fuel Burning Equipment | <input type="checkbox"/> |
| 7. Control of VOCs | <input checked="" type="checkbox"/> |
| 8. Sampling, Testing and Reporting | <input type="checkbox"/> |
| 9. Visible Emissions Standards | <input type="checkbox"/> |
| 10. Control of Fugitive Dust | <input type="checkbox"/> |
| 11. Toxic Air Pollutants Control | <input checked="" type="checkbox"/> |
| 12. Vehicle Emissions Inspections and Testing | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

- | | |
|--|-------------------------------------|
| 13. Risk Management Plan | <input checked="" type="checkbox"/> |
| 14. Bay Area Air Quality Management District regulations | <input checked="" type="checkbox"/> |

Hazardous Waste Management Regulations

- | | |
|---|-------------------------------------|
| 1. Identification and Listing of Hazardous Waste (40 CFR 261) | |
| - Characteristic Waste | <input checked="" type="checkbox"/> |
| - Listed Waste | <input checked="" type="checkbox"/> |
| 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | |
| - Manifesting | <input checked="" type="checkbox"/> |

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. California Code of Regulations Title 23 ☒
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. California Hazardous Materials Business Plan - CCR Title 19 ☒
- 7. ☐

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☐
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☒
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☐
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☐
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☐
16. Standards Applicable to Indirect Discharges (Pretreatment) ☒

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. City of Hayward Wastewater Discharge Regulations ☒
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☒
4. Chemical Information Rules (40 CFR 712) ☒
5. Health and Safety Data Reporting (40 CFR 716) ☒
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

☐
☐

2. RCRA Corrective Action (identify)

☐
☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

3.

☐

4.

☐